

UNITED STATES BANKRUPTCY COURT
District of New Jersey

U.S. BANKRUPTCY COURT
FILED
NEWARK, NJ

2016 DEC 28 PM 12:44

JAMES J WALDRON

BY: *M Gonzalez*
DEPUTY CLERK

Chapter 13

Case No. 16-30358

Hearing Date: 01/04/2017

In re: Marcia Paulette McPherson

(Debtor)

DEBTOR'S OBJECTION TO CREDITOR'S OBJECTION AND NOTICE OF SERVICE

Debtor files this Objection as to Secured Creditor Deutsche Bank National Trust Company as Trustee for Holders of New Century Home Equity Loan Trust, Series 2005-A, Asset Backed Pass-Through Certificates Objection on the following grounds:

1. Secured Creditor's objection is based on incorrect information in the original plan.
2. Debtor has modified the plan to reflect monthly payment of \$535.00 in the plan (to the trustee) and regular monthly payment of \$1,554.00 outside the plan (paid directly to creditor, Bank of America).
3. Debtor modified plan is based on total Bank of America arrearages of \$32,000.00 for a term of 60 months.
4. Arrears as stated in the Plan, are based on Claimant's Monthly Mortgage Statement Summary dated October 17, 2016. A copy of the Claimant's Statement is attached hereto as Exhibit "A" and made a part hereof.
5. Accordingly, the debtor fully compensates the Movant.

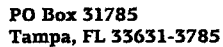
WHEREFORE, Debtor respectfully requests that the Claimant's Objection to Confirmation be denied and the plan be confirmed accordingly.

Date:

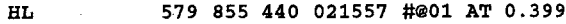
12/28/16

Marcia McPherson

Marcia Paulette McPherson, Debtor
Pro Se
574 Selfmaster Parkway
Union, NJ 07083
Tel: (908) 787-2917



En Español: 1.800.295.0025



11/01/16

If payment is received after 11/16/16, \$43.92 late fee will be charged.*

Date	Description	Charges	Payments
09/28/16	Attorney/Trustee Fee	\$446.25	
09/28/16	Recording Fee	\$40.00	
09/28/16	Process Server	\$44.00	
10/03/16	Property Inspection	\$15.00	

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Additional contact information

Housing counselor information: If you would like counseling or assistance, you can contact the U.S. Department of Housing and Urban Development (HUD). For a list of homeownership counselors or counseling organizations in your area, go to hud.gov/offices/hsg/sfh/hcc/hcs.cfm or call 1.800.569.4287.

General Inquiries

PO Box 31785
Tampa, FL 33631-3785

Insurance matters

Insurance Dept.
PO Box 961291
Fort Worth, TX 76161-0291

Notice of Error, Requests for Information and Qualified Written Requests (as defined in RESPA) must be sent to: PO Box 942019, Simi Valley, CA 93094-2019. You have certain rights under federal law to resolve errors and request information related to your account. For more information about these rights, you can go to bankofamerica.com or contact us.

Other important information

Debt Collection Notice: Bank of America, N.A. is required by law to inform you that this communication is from a debt collector.

Bankruptcy Notice: If you are currently in a bankruptcy proceeding or have previously received a discharge of this debt under bankruptcy law, this notice is being sent to you for informational purposes only and is not an attempt to collect a debt, a demand for payment, a request on an obligation or an attempt to impose personal liability upon you for a discharged debt.

Credit reporting notice: We may report information about your account to credit bureaus. Late payments, missed payments or other defaults on your account may be reflected in your credit report.

Late Fee: The Late Fee shown on this statement may not be charged in limited circumstances, such as: changes to your account relating to loan modification trial plans, foreclosure, bankruptcy, natural disaster, and special forbearance on your loan, or due to applicable State or Federal law requirements.

Overdue payments, fees, and charges: If your loan is delinquent, this amount may include unpaid amounts for optional products. If the loan is not delinquent, the amount will not include unpaid amounts for optional products. Failure to pay amounts due on optional products may result in cancellation of your product. You have the right to cancel your optional product(s) at any time. For questions regarding your optional product, please contact the product provider directly using the phone number appearing in the "Optional products" section of your statement.

Paid year-to-date: Balances in the "Past payments breakdown" section shouldn't be used for year-end tax reporting. Please use the information on IRS Form 1098, which will be provided during tax season, for reporting purposes. Balances for loans that have been service-transferred or have undergone modification may reflect activity that has occurred since the date of transfer or modification only.

Payoff: You can request a payoff quote by calling 1.800.669.5833. If a third party will be requesting a payoff quote on your behalf, you must authorize the third party to make the request. A fax fee may apply if you or a third party want the payoff quote faxed. If so, the amount of the fee will be disclosed at the time the expedited delivery is requested. If we receive payoff funds greater than the amount required to pay off your loan, we'll process and mail a refund of the overage to your mailing address on our loan servicing system within 20 business days of the payoff. You can update your mailing address on our loan servicing system by calling customer service or through Bank of America's Online Banking service available on our website at .

Statement information: The information contained in this statement is accurate as of the date of this statement but may not contain all information related to your loan. For the most up to date and complete information regarding your loan, please contact customer service.



Your Home Loan Account

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Delinquency notice

Your loan is in the foreclosure process. As of 10/17/16, you are 535 days delinquent on your mortgage loan. This statement provides an estimate of the outstanding amounts due on your loan. Do not send in this amount. To discuss available payoff and/or workout options, please call your assigned Customer Relationship Manager at the number on the first page of the statement.

Recent account history

Payment due date	Total amount due	Unpaid balance due	Outstanding balance due
	\$0.00	Prior to 04/01/16	\$17,316.44
04/01/16	\$1,565.26	\$1,565.26	\$18,881.70
05/01/16	\$1,565.26	\$1,565.26	\$20,446.96
06/01/16	\$1,565.26	\$1,565.26	\$22,012.22
07/01/16	\$1,565.26	\$1,565.26	\$23,577.48
08/01/16	\$1,565.26	\$1,565.26	\$25,142.74
09/01/16	\$1,565.26	\$1,565.26	\$26,708.00
10/01/16	\$1,565.26	\$1,565.26	\$28,273.26
11/01/16	\$1,610.04	\$1,610.04	\$29,883.30
	Outstanding fees and charges		\$1,676.50
	Total amount due		\$31,559.80

The information within the recent account history table above represents an estimate of your total outstanding and current principal, interest, escrow (if applicable), fees and charges due. Do not send in this amount. If you would like to reinstate your loan, please call your assigned Customer Relationship Manager at the number on the first page of the statement.

Foreclosure filing

Bank of America, N.A. has made the first notice or filing required by law for foreclosure.

There has been a payment default or other default on your loan that could result in acceleration of all sums due under the note. As a result, Bank of America, N.A. will use companies, including but not limited to its affiliate ReconTrust Company, N.A., to provide services required to protect the note holder's interest and rights in the property and under the note and security instrument, including any remedies thereunder -- the Default-Related Services. Bank of America, N.A. will assess fees to your loan account for the Default Related Services, including those provided by its affiliate. A schedule of fees that may be charged to your account for Default Related Services is available at the following Web address: <http://www.bankofamerica.com/defaultfees>. If you do not have Internet access, please contact us at 1.800.669.6650 to have a fee schedule mailed to you. The fee schedule contains a list of the common non-state specific Default-Related Services you could be charged, however it does not include a complete list of all fees or charges that could be assessed on your loan account.

As long as your loan remains delinquent, Bank of America, N.A. will conduct inspections of your property on a periodic basis. Our right to conduct these inspections and assess the costs to you is described in your loan documents.

Bank of America, N.A. offers programs that may help you bring your loan current. To speak to a Customer Relationship Manager about what programs may be available to you, please call Customer Service at 1.800.669.6650.